

# PUBLIC SUBMISSION

|   |
|---|
| <b>As of:</b> November 09, 2010<br><b>Received:</b> November 08, 2010<br><b>Status:</b> Posted<br><b>Posted:</b> November 09, 2010<br><b>Tracking No.</b> 80b84d97<br><b>Comments Due:</b> November 08, 2010<br><b>Submission Type:</b> Web |
|---|

**Docket:** EPA-R03-OW-2010-0736  
Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001  
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0428  
Comment submitted by Steven J. Thomas, Fulton County Planning Commission, County of Fulton, Pennsylvania

---

## Submitter Information

**Submitter's Representative:** Steven J. Thomas  
**Organization:** Fulton County Planning Commission  
**Government Agency Type:** Local  
**Government Agency:** County of Fulton, Pennsylvania

---

## General Comment

The Fulton County Planning Commission strongly objects to the EPA's proposed TMDL for the Chesapeake Bay. Passing of the new regulations would cause significant economic hardship of the municipal authorities and residents linked to those systems. The proposed TMDL regulations are absolutely not economically feasible at this time in Fulton County. According to the Bureau of Labor and Statistics (Sept. 2010), Fulton County's unemployment rate is 13.7%. This is 2nd highest rate in Pennsylvania. Additionally, our largest plant, in McConnellsburg Borough, has already invested thousands of dollars into an upgrade project to meet the current requirements of 6 mg/I TN and 0.8 mg/I TP. Requiring them to meet more stringent loads would cause extreme hardship on the end-users, the residents.

While the intent of the regulations is commendable, the Fulton County Planning Commission can not support the proposed TMDL because of the severe economic impact that would be placed on our local communities.